## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS DIVISION OF AUSTIN

PIERRE BRAZEAU, Individually and on Behalf Of All Others Similarly Situated,

Case No. 1:21-cv-00751-RP

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER, ERIC J. SCHOEN, JAMES W. KUPIEC, NADAV FRIEDMANN and MICHAEL MARSMAN,

Defendants.

WANDA NEWELL, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER, and ERIC J. SCHOEN,

Defendants.

KATLYN K. REIN, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER, ERIC J. SCHOEN, JAMES W. KUPIEC, NADAV FRIEDMANN, and MICHAEL MARSMAN,

Defendants.

**CLASS ACTION** 

DECLARATION OF MATTHEW R.
MCCARLEY IN SUPPORT OF MR.
BURMEISTER'S MOTION TO
CONSOLIDATE RELATED ACTIONS,
APPOINT LEAD PLAINTIFF, AND
APPROVE SELECTION OF LEAD
COUNSEL

Case No. 1:21-cv-00760-RP

Case No. 1:21-cv-00856-RP

I, Matthew R. McCarley, hereby declare as follows:

1. I am an attorney at The Fears Nachawati Law Firm ("Fears | Nachawati"), Proposed

Liaison Counsel for this action and have personal knowledge of the facts set forth herein. I am

duly admitted to practice law in the State of Texas and admitted before this Court. I make this

Declaration in support of the Motion of Steve Burmeister ("Movant") to consolidate related

actions, appoint him as Lead Plaintiff, and approve his selection of Kahn Swick & Foti, LLC as

Lead Counsel and Fears | Nachawati as Liaison Counsel.

2. Attached hereto as **Exhibit A** is a true and correct copy of Movant's PSLRA

certification.

3. Attached hereto as **Exhibit B** is a true and correct copy of the loss chart evidencing

Movant's losses in this action.

4. Attached hereto as **Exhibit C** is a true and correct copy of the Declaration of Steve

Burmeister in Support of His Motion to Appoint Lead Plaintiff and Approve His Selection of Lead

Counsel.

5. Attached hereto as **Exhibit D** are true and correct copies of: (i) the August 27, 2021

Notice published on *PRNewswire*; and (ii) the August 30, 2021 Notice published on *Business Wire*.

6. Attached hereto as **Exhibit E** is a true and correct copy of the firm résumé of Kahn

Swick & Foti, LLC.

7. Attached hereto as **Exhibit F** is a true and correct copy of Fears | Nachawati's firm

résumé.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true

and correct.

Dated: October 26, 2021

/s/ Matthew R. McCarley

MATTHEW R. McCARLEY

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